

One Titan
Titan International, Inc.
Mr. Michael Troyanovich
Corporate Secretary and General Council
201 Spruce Street
Quincy, Illinois 62301

Re: Administrative Order, Docket No. 86-F0011
DICO's Progress Report for October 2015, November 2015, and December 2015,
Des Moines TCE Site, Des Moines Iowa

Dear Mr. Troyanovich,

The U.S. Environmental Protection Agency received DICO's Progress Reports for October, November and December 2015. The EPA has reviewed the reports and approves the documents, although I have a few comments. Please review the comments below and revise the future reports accordingly.

EPA Comment #1 – The water level data table in all of the reports has a * behind select wells. What does this indicate? An explanation should be included below the table on all future reports so the reader knows what the * means.

EPA Comment #2 – In the October report, the water level table indicates that the water levels were measured over a three day period (October 12-14, 2015). Because water levels were measured over such a long duration, they should not be used to develop groundwater flow maps or calculate groundwater flow direction. Measuring the water levels over a three day period allows for various factors that can effect water level readings to fluctuate (i.e. barometric pressure, rain, etc.) and using them to determine groundwater flow may not present a representative picture of conditions on the site. Therefore, every effort should be made in the future to measure the water levels on the same day.

If you have any questions concerning this matter, please contact me at (913) 551-7977.

Sincerely,

Erin S. McCoy, P.G.
Remedial Project Manager
Iowa/Nebraska Remedial Branch
Superfund Division

Cc: Mr. Brian Mills, Consultant, DICO
Mr. Gazi George, Consultant, DICO
Mr. Hylton Jackson, INDR
Mr. Vern Rash, DMWW